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January 6, 2020

VIA EMAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: Picard v. Kurzrok, Adv. Pro. No. 09-01305 (SMB)

Your Honor,

We are counsel to the Trustee in the above-captioned action. We write jointly with counsel for Morton Kurzrok, who is the sole remaining defendant in this action, to apprise Your Honor of the status of the Trustee's settlement discussions with Morton Kurzrok.

The Trustee and Morton Kurzrok (together, the "Parties") have made substantial progress since Your Honor agreed to a 60-day extension of all outstanding discovery deadlines in this case (including an extension to January 8, 2020 for the Trustee to take Mr. Kurzrok's deposition), and the Parties have now reached a settlement agreement in principle. Given the nature of the settlement agreement and requisite supporting documents, as well as the logistics involved with the signatories being located in Florida, the Parties request jointly that Your Honor grant an extension of 60 days for all remaining discovery deadlines in the case to allow the Parties to finalize the settlement documents. This extension request will also allow the Parties to conserve considerable time and resources as once the settlement documents are finalized, there will be no need for further discovery because this matter will be closed.

The Parties are available to discuss the instant request should Your Honor have any questions.

Honorable Stuart M. Bernstein
January 6, 2020
Page 2

Respectfully submitted,

/s/ Kathryn M. Zunno-Freaney
Kathryn M. Zunno-Freaney

cc: Andrew S. Lewner